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ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/4/2021

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MEMO ENDORSED

March 4, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Gergely Csikos v. S.M. Construction & Contracting, Incorporated, et al.
Docket No.: 18-cv-09598-VEC

Your Honor:

As you may recall, we represent Plaintiff, Gergely Csikos, in the above referenced action.

Please allow this correspondence to serve as (1) the parties "joint letter" submission pursuant to the Order of January 5, 2021 [DE 124]; (2) a letter motion to adjourn the pre-trial conference from March 12, 2021 to March 26, 2021; and (3) as a request to convert same into a pre-motion conference.

On January 11, 2021, Defendant/Third-Party Plaintiff/Fourth-Party Plaintiff 230 Park South Apartments, Inc. filed its Fourth-Party Complaint against IR Holdings, LLC, Parkview Developers, LLC and Ian Reisner. [DE 129] Answers to the Fourth-Party Complaint were due on February 18, 2021 [DE 136-139], to date, however, the Fourth-Party Defendants have failed to appear in the action.

Today, the parties conferred and discussed the issue regarding the non-appearance of the Fourth-Party Defendants and the impending conference. Jeffrey Van Etten, counsel for Defendant 230 Park South Apartments, Inc. advised us that he had spoken with Vincent Avery¹ and that Mr. Avery had assured him that he would be filing the Fourth-Party Defendants' Answers shortly. As such, Mr. Van Etten requested our consent to an adjournment of the pre-trial conference presently scheduled for March 12, 2021.

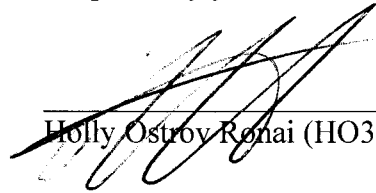
¹ Fourth-Party Defendant Ian Reisner is being represented by counsel for Third-Party Defendant Remodel Art Corp.

As set forth in Mr. Van Etten previous letter, the parties agree that no substantial future discovery will be required. [DE 120] Once Fourth-Party Defendants appears in this action, discovery will be substantially complete and pursuant to FRCP 56(b), the parties may file Summary Judgment motions within thirty days.

In view of the foregoing, the parties jointly request that the pre-trial conference presently scheduled for March 12, 2021, be adjourned two weeks, and further, be converted into a pre-motion conference to set a briefing schedule of the Summary Judgment motions.

Thank you for your attention to this matter.

Respectfully yours,


Holly Ostrov Ronai (HO3923)

Cc: All parties via ECF

Application GRANTED. The pretrial conference is adjourned to **March 26, 2021 at 11:00 a.m.** The parties' joint letter is due by **March 18, 2021.** The parties must appear for the hearing by calling (888) 363-4749, using the access code 3121171 and the security code 9598.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

3/4/2021